

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

***In re C. R. Bard, Inc.
Pelvic System Products Liability Litigation
MDL No. 2187***

Civil Action No. 2:14-CV-18142

SHORT FORM COMPLAINT

Come now the Plaintiffs named below, and for their Complaint against the Defendants named below, incorporate The Master Complaint in MDL No. 2187 by reference. Plaintiffs further show the Court as follows:

1. Female Plaintiff

Amanda Bryant

2. Plaintiff Husband

Kevin Bryant

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator)

N/A

4. State of Residence

Oklahoma

5. District Court and Division in which action is to be filed upon transfer from the MDL.

Western District of Oklahoma

6. Defendants (Check Defendants against whom Complaint is made):

- ☒ A. C. R. Bard, Inc. ("Bard")
☐ B. Sofradim Production SAS ("Sofradim")
☐ C. Tissue Science Laboratories Limited ("TSL")

- ☐ D. Ethicon, Inc.
- ☐ E. Johnson & Johnson
- ☐ F. American Medical Systems, Inc. (“AMS”)
- ☐ G. Boston Scientific Corporation
- ☐ H. Mentor Worldwide LLC
- ☐ I. Coloplast Corp.
- ☐ J. Cook Incorporated
- ☐ K. Cook Biotech, Inc.
- ☐ L. Cook Medical, Inc.
- ☐ M. Desarrollo e Investigación Médica Aragonesa, S.L. (“DIMA”)
- ☐ N. Neomedic International, S.L.
- ☐ O. Neomedic Inc.
- ☐ P. Specialities Remeex International, S.L.

7. Basis of Jurisdiction

- ☒ Diversity of Citizenship

8.

a. Paragraphs in Master Complaint upon which venue and jurisdiction lie:

1-19

b. Other allegations of jurisdiction and venue

9. Defendants' products implanted in Plaintiff (Check products implanted in Plaintiff)

- ☐ A. The Align Urethral Support System;
- ☒ B. The Align TO Urethral Support System;
- ☐ C. The Avaulta Anterior BioSynthetic Support System;
- ☐ D. The Avaulta Posterior BioSynthetic Support System;
- ☐ E. The Avaulta Plus Anterior Support System;
- ☐ F. The Avaulta Plus Posterior Biosynthetic Support System;
- ☐ G. The Avaulta Solo Anterior Synthetic Support System;
- ☐ H. The Avaulta Solo Posterior Synthetic Support System;
- ☐ I. The InnerLace BioUrethral Support System;
- ☐ J. The Pelvicol Acellular Collagen Matrix;
- ☐ K. The PelviLace BioUrethral Support System;
- ☐ L. The PelviLace TO Trans-obturator BioUrethral Support System;
- ☐ M. The PelviSoft Acellular Collagen BioMesh;
- ☐ N. The Pelvitex Polypropylene Mesh;
- ☐ O. The Uretex SUP Purbourethral Sling;
- ☐ P. The Uretex TO Trans-obturator Urethral Support System;
- ☐ Q. The Uretex TO2 Trans-obturator Urethral Support System; and
- ☐ R. The Uretex TO3 Trans-obturator Urethral Support System.
- ☐ S. Other

10. Defendants' Products about which Plaintiff is making a claim. (Check applicable products)

- ☐ A. The Align Urethral Support System;
- ☒ B. The Align TO Urethral Support System;
- ☐ C. The Avaulta Anterior BioSynthetic Support System;
- ☐ D. The Avaulta Posterior BioSynthetic Support System;
- ☐ E. The Avaulta Plus Anterior Support System;
- ☐ F. The Avaulta Plus Posterior Biosynthetic Support System;
- ☐ G. The Avaulta Solo Anterior Synthetic Support System;
- ☐ H. The Avaulta Solo Posterior Synthetic Support System;
- ☐ I. The InnerLace BioUrethral Support System;
- ☐ J. The Pelvicol Acellular Collagen Matrix;
- ☐ K. The PelviLace BioUrethral Support System;
- ☐ L. The PelviLace TO Trans-obturator BioUrethral Support System;
- ☐ M. The PelviSoft Acellular Collagen BioMesh;
- ☐ N. The Pelvitex Polypropylene Mesh;
- ☐ O. The Uretex SUP Purbourethral Sling;
- ☐ P. The Uretex TO Trans-obturator Urethral Support System;
- ☐ Q. The Uretex TO2 Trans-obturator Urethral Support System; and
- ☐ R. The Uretex TO3 Trans-obturator Urethral Support System.
- ☐ S. Other

11. Date of Implantation as to Each Product

07/29/2011

12. Hospital where Plaintiff was implanted (including City and State)

Mercy Hospital, Oklahoma City, OK

13. Implanting Surgeon

Dr. K. Anthony Shanbour

14. Counts in the Master Complaint brought by Plaintiffs

☒ Count I

☒ Count II

☒ Count III

☒ Count IV

☒ Count V

☒ Count VI

☒ Count VII (by the Husband)

☒ Count VIII

☐ Other _____ (please state the facts supporting this Count in the space, immediately below)

☐ Other _____ (please state the facts supporting this Count in the space, immediately below)

Respectfully Submitted June 11, 2014

/s/: M. Brandon Smith

M. Brandon Smith

West Virginia Bar No: 11751

C. Andrew Childers

Georgia Bar No: 124398

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